

## THE WHITE HOUSE

WASHINGTON

October 28, 1974

MEMORANDUM FOR DIRECTORS OF:

CENTRAL INTELLIGENCE AGENCY  
COUNCIL OF ECONOMIC ADVISERS  
COUNCIL ON ENVIRONMENTAL QUALITY  
COUNCIL ON INTERNATIONAL ECONOMIC  
POLICY  
NATIONAL SECURITY COUNCIL  
OFFICE OF ECONOMIC OPPORTUNITY  
OFFICE OF MANAGEMENT AND BUDGET  
OFFICE OF THE SPECIAL REPRESENTATIVE  
FOR TRADE NEGOTIATIONS  
OFFICE OF TELECOMMUNICATIONS POLICY  
SPECIAL ACTION OFFICE FOR DRUG ABUSE  
PREVENTION

FROM: DONALD RUMSFELD

Attached are two memos and a packet of information which has been distributed to members of the White House staff and other executive office staffs whose reporting mechanisms are combined with the White House staff. Your office is considered a separate office within the Executive Office of the President and under present regulations as head of the Office, your confidential Statement of Employment and Financial Interests is filed with the Chairman of the Civil Service Commission. The President has directed that all members of the Executive Branch be in compliance with the regulations concerning conflicts of interests and the filing of the financial statements.

In the event your own filing with the Chairman of the Civil Service Commission is not current, please take immediate steps to update it and bring it into compliance. In addition, you are requested to take all necessary steps to be certain that your staff members who are required to file the Statement of Employment and Financial Interests have done so and that they have been properly evaluated by those on your staff entrusted with this responsibility.

It will also be appreciated if you will advise the staff secretary by November 30, 1974 on the status of your office's compliance with these requirements.

NSC review completed.

THE WHITE HOUSE

WASHINGTON

October 28, 1974

MEMORANDUM FOR: WHITE HOUSE OFFICE  
VICE PRESIDENT'S OFFICE  
DOMESTIC COUNCIL

FROM: DONALD RUMSFELD *DR R. Ford*  
Assistant to the President

SUBJECT: Standards of Conduct/Confidential  
Statement of Employment and  
Financial Interests

The attached manual on standards of conduct for the White House staff is being distributed at President Ford's direction to remind and acquaint each employee with the high standards of conduct which are expected of each employee as members of this Administration. It contains important information which will assist you in avoiding any conflict of interest or conduct which, although proper in fact, could appear otherwise.

The President has emphasized that each of us is to be governed by the rules of truthfulness and personal and professional integrity. This places a special obligation on all personnel to recognize that his or her actions reflect on the Office of the Presidency, and to carefully weigh actions against the highest standards and criteria for conduct in public office.

The attached memo from the Counsel to the President explains in more detail some of the main problem areas of which each employee should be aware. Please read the material carefully and where appropriate, promptly prepare the required reports. If there are any questions at any time during the course of employment, they should be discussed with the Counsel to the President or a member of his staff.

THE WHITE HOUSE

WASHINGTON

October 28, 1974

MEMORANDUM FOR: ALL EMPLOYEES OF THE WHITE HOUSE  
OFFICE, THE DOMESTIC COUNCIL  
AND THE VICE PRESIDENT'S OFFICE

FROM: Philip W. Buchen  
Counsel to the President *P.W.B.*

SUBJECT: Standards of Conduct/Confidential Statement  
of Employment and Financial Interests

In accordance with the President's directive, this is to advise you of the stringent legal requirements governing the standards of conduct and conflicts of interest applicable to each of you. Additionally, all recipients who are employees (government employees) paid at a level equivalent to GS-13 (\$21,816) and above, or are consultants (special government employees) regardless of grade or salary, are required by law to file certain employment and financial information.

While the employees of the Vice President's office would not normally fall under the responsibility of the Counsel to the President in this respect, they are included in this distribution in order to assist during the transitional period.

Statements of Employment  
and Financial Interests

As noted above, if you are an employee paid at an annual rate in excess of \$21,816 or a consultant, regardless of salary, you are required to complete and file certain forms calling for employment and financial information. If you are a newly-incoming employee and are subject to this requirement, you are to complete the attached forms which should be filed not later than thirty (30) days after entrance on duty.

In order to insure that our records are complete, all present personnel (full-time and consultants) subject to the reporting requirement who have not filed a statement since August 9, 1974, must file the attached statement by November 8. Additionally, to assist this office in

evaluating your statement, and to provide you with any necessary guidance, you are also requested to complete and return the attached job description form along with your statement. If you have filed a statement since August 9, 1974, you now need file only the job description form.

Should you have any questions or require any assistance in completing these forms, please contact Mr. Kenneth Lazarus, Associate Counsel to the President, at Ext. 6297.

Subsequent to this initial reporting, you will be notified of the need for a refiling in June of each year. Notification of any interim changes in financial interests or job description as set forth in the forms will be required at your initiative.

For your convenience, if you have submitted comparable information in the past to this or any other office, you may simply provide a copy of that submission and note any changes. It is recommended that you keep a copy of the information you provide this office for future reference. Please send your data to Mr. Kenneth Lazarus, Room 106, OEOB.

Personnel at the White House on detail should look to their respective agencies for any relevant reporting requirements. However, such personnel are subject to the White House Standards of Conduct.

#### Standards of Conduct

The Standards of Conduct to which you are subject and which are considered at length in attachments may be briefly summarized as follows:

- a. Authorities. Each of you is subject to Regulations (3 CFR, Part 100) issued under the authority of Executive Order 11222 (May 8, 1965), governing your conduct. Copies of these Regulations, the Executive Order, and relevant Federal criminal statutes (P. L. 87-949, Title 18, U.S.C. Secs. 201, et seq.) are included in the attached materials.

As you are responsible for conforming your conduct to the standards required by these authorities, I strongly urge you to study the enclosed materials at once and to retain them for your future reference.

b. Conflicts in General. A "conflict of interest" refers to any situation in which a government official has an actual or apparent personal interest in the outcome of a matter which he or she is in a position to influence through decision, recommendation, advice or other formal or informal action. A violation of law does not require an intent to favor one's personal interest, and cannot be overcome by a showing of the absence of such an intent. Participation, by itself, in a matter in which you have an interest is unlawful. Whenever you perceive even the possible appearance of a conflict you should disclose this fact to your superior and to the Counsel to the President to obtain guidance as to how the matter should be handled. Financial interests most typically giving rise to conflict problems are stocks, bonds, outside employment (including any continuing interest in or income from a prior employment or partnership relationship). Real estate held as an investment also counts, as do any unusual debt obligations. The interests of all members of your family living within your household are regarded as your own.

c. Illustrative Prohibitions. In order to develop an awareness of our Standards of Conduct and potential conflicts which may confront you, a number of illustrations of prohibited conduct may be considered. However, you should be cautioned that these illustrations are not exhaustive in terms of potential problem areas or their treatment of the issue.

1. Regulatory Agencies. Executive Office personnel should be especially careful about contacts with regulatory agencies, and by directive from the President, should clear in advance any contacts with such agencies or with litigating divisions of the Department of Justice through the office of the Counsel to the President.
2. Lobbying. If carried on with appropriated funds, lobbying is expressly prohibited by law.
3. Political Activity. Political activity by White House personnel is, of course, subject to restrictions. For example, no political campaign activity, and especially no solicitation, receipt, expenditure or possession of campaign funds may occur on the premises of any Federal building.
4. Misuse of Information. Disclosure of classified or other confidential information is, of course, prohibited. Equally important is to avoid the fact and appearance of using information obtained from your official duties for private gain, especially through investments or speculations. Because of the inevitable appearance of impropriety, White House personnel should avoid engaging in speculative activities of any kind.
5. Gifts. Receipt of gifts, payment of travel, lodging, entertainment and other expenses, or the receipt of speaking honoraria are generally prohibited except in the limited circumstances described in the attached materials. Gifts to superiors within the White House are also illegal.
6. Appearance of Impropriety. Finally, employees must be ever sensitive to avoid the appearance of acting on behalf of some private interest or of a conflict or other impropriety which can be fully as damaging as the real thing. You should not,

for example, be found in constant or suggestive contact with persons having important stakes in government actions for which you have some responsibility.

Closing Note

I trust that this material will be of assistance to you and that we will have your cooperation in meeting our responsibilities in this area. The office of the Counsel to the President stands ready to assist you as needed.

**EXECUTIVE SECRETARIAT**

**Routing Slip**

TO:		ACTION	INFO	DATE	INITIAL
1	DCI				
2	DDCI				
3	S/MC				
4	DDS&T				
5	DDI				
6	DDM&S	X (less packet of info)			
7	DDO				
8	D/DCI/IC				
9	D/DCI/NIO				
10	OGC	X			
11	OLC				
12	IG				
13	Compt				
14	D/Pers				
15	D/S				
16	DTR				
17	Asst/DCI				
18	AO/DCI				
19					
20					
21					
22					

SUSPENSE

Date

Remarks:

To General Counsel: Please get together with DDA and assure Agency compliance with the attached.

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